

1 KRAMER ALBERTI LIM & TONKOVICH LLP
2 Robert F. Kramer (SBN 181706)
3 rkramer@krameralberti.com
4 David Alberti (SBN 220625)
5 dalberti@ krameralberti.com
6 Sal Lim (SBN 211836)
7 slim@krameralberti.com
8 Russell S. Tonkovich (SBN 233280)
9 rtonkovich@krameralberti.com
10 577 Airport Blvd, Suite 250
11 Burlingame, CA. 94010
12 Tel: 650 825-4300 Fax: 650 460-8443

13 Attorneys for Plaintiff
14 POLARIS POWERLED TECHNOLOGIES, LLC

15 ZACHARIAH SUMMERS (SBN 255284)
16 zachsummers@quinnemanuel.com
17 865 S. Figueroa St., 10th Floor
18 Los Angeles, CA 90017
19 Tel: (213) 443-3000 Fax: (213) 443-3100

20 Attorneys for Defendants
21 VIZIO, INC. and Defendants listed on signature page

22 UNITED STATES DISTRICT COURT
23 CENTRAL DISTRICT OF CALIFORNIA

24 POLARIS POWERLED
25 TECHNOLOGIES, LLC,

26 Plaintiff,
27 v.

28 VIZIO, INC., HON HAI PRECISION
INDUSTRY CO., LTD. D/B/A
FOXCONN TECHNOLOGY GROUP,
COMPETITION TEAM
TECHNOLOGY USA INC., TOP
VICTORY ELECTRONICS
(TAIWAN) CO. LTD., TOP
VICTORY INVESTMENTS LTD.,
TPV TECHNOLOGY LTD., TPV
INTERNATIONAL (USA), INC.,
TREND SMART AMERICA, LTD.,
INNOLUX CORP., INNOLUX USA,
INC., AMTRAN TECHNOLOGY
CO., LTD., AMTRAN LOGISTICS,
INC., and NEWEGG, INC.,

Defendants.

Case No. 2:23-cv-03478-GW-PDx

**STIPULATION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint served: May 8, 2023

Current response dates: May 30, 2023
May 31, 2023
June 2, 2023
June 12, 2023

New response dates: June 6, 2023
June 7, 2023
June 9, 2023
June 19, 2023

1 Pursuant to Local Rule 8-3, the below-referenced parties, by and through
2 their counsel, hereby stipulate and agree as follows:

3 WHEREAS Plaintiff Polaris PowerLED (“Polaris PowerLED”) filed its
4 initial Complaint on May 8, 2023.

5 WHEREAS Defendant VIZIO’s initial deadline to respond under the Federal
6 Local Rules is May 31, 2023.

7 WHEREAS Defendant TPV International (USA), Inc.’s initial deadline to
8 respond under the Federal Local Rules is May 30, 2023 and Defendant Trend Smart
9 America, Ltd.’s initial deadline to respond under the Federal Local Rules is June 2,
10 2023.

11 WHEREAS Defendant AmTRAN Logistics, Inc.’s initial deadline to respond
12 under the Federal Local Rules is May 30, 2023.

13 WHEREAS Central District of California Local Rule 8-3 provides that an
14 extension of 30 days or less to respond to the initial complaint is effective without
15 court approval.

16 WHEREAS no party to this action will be prejudiced by the proposed brief
17 extensions of time.

18 WHEREFORE, IT IS HEREBY STIPULATED by, between and among
19 Plaintiff and the above-listed Defendants that:

20 Defendant VIZIO’s deadline to file its response to Plaintiff’s Complaint is
21 extended until and including June 7, 2023.

22 Defendant TPV International (USA), Inc.’s deadline to file its response to
23 Plaintiff’s Complaint is extended until and including June 6, 2023 and Defendant
24 Trend Smart America, Ltd.’s deadline to file its response to Plaintiff’s Complaint is
25 extended until and including June 9, 2023.

26 Defendant AmTRAN Logistics, Inc.’s deadline to file its response to
27 Plaintiff’s Complaint is extended until and including June 6, 2023.
28

1 STIPULATED AND AGREED:

2
3 Dated: May 30, 2023

KRAMER ALBERTI LIM & TONKOVICH LLP

5 By: /s/ Robert F. Kramer
6 Robert F. Kramer

7 Attorneys for Plaintiff
8 Polaris PowerLED Technologies, LLC

9
10 Dated: May 30, 2023

11 QUINN EMANUEL URQUHART &
12 SULLIVAN LLP

13 By: /s/ Zachariah Summers
14 Zachariah Summers

15 Attorneys for Defendants
16 VIZIO, Inc., TOP VICTORY ELECTRONICS
17 (TAIWAN) CO. LTD., TOP VICTORY
18 INVESTMENTS LTD., TPV TECHNOLOGY
19 LTD., TPV INTERNATIONAL (USA), INC.,
TREND SMART AMERICA, LTD., INNOLUX
CORP., INNOLUX USA, INC., AMTRAN
TECHNOLOGY CO., LTD., and AMTRAN
LOGISTICS, INC.

20 All other signatories listed, and on whose behalf the filing is submitted, concur in
21 the filing's content and have authorized the filing.